

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Kristi Munn (AKA: Kristi Marie Munn) - DOB: XXXXXX

Thomas Munn (AKA: Tom Munn) - DOB XXXXXX

Dawn Munn - DOB XXXXXX

Joshua Munn (AKA: Josh Munn) - DOB XXXXXX

Kayli Munn - DOB XXXXXX

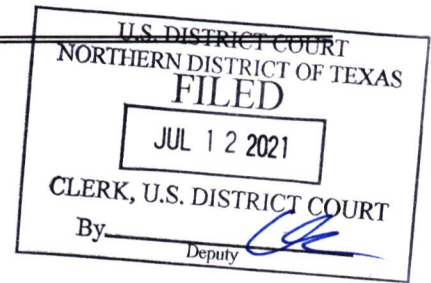
Defendant(s)

Case: 1:21-mj-00521

Assigned to: Judge Meriweather, Robin M.

Assign Date: 7/12/2021

Description: COMPLAINT W/ ARREST WARRANT



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of _____ in the
 _____ in the District of Columbia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,

18 U.S.C. § 1752(a)(2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds,

40 U.S.C. § 5104(e)(2)(D) - Disorderly Conduct in a Capitol Building,

40 U.S.C. § 5104(e)(2)(G) - Parading, Demonstrating, or Picketing in a Capitol Building.

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Complainant's signature

David L. Bolyard, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
 by telephone.

Date: 07/12/2021

2021.07.12

10:14:01 -04'00'

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant, David Lee Bolyard, is a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Amarillo Resident Agency of the Dallas Division. In my duties as a special agent, I investigate national security matters, including domestic terrorism. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice

President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

The FBI has located evidence indicating that Kristi Munn, Thomas “Tom” Munn, Dawn Munn, Joshua “Josh” Munn, and Kayli Munn were unlawfully inside the U.S. Capitol on January 6, 2021, based on information received from a tipster, open source and government databases, and the subsequent investigation described below. The investigation revealed multiple videos and social media messages indicating that Kristi, Tom, Dawn, Josh, and Kayli Munn are part of a large nuclear family that traveled from Borger, Texas to Washington, D.C. and entered the U.S. Capitol on January 6, 2021.

Information Provided by Tipster

On January 9, 2021, the FBI received information from a tipster that Kristi Munn entered the U.S. Capitol on January 6, 2021. During a follow-up interview, the tipster reported that Kristi Munn and other members of her family traveled from Texas to Washington, D.C. for the rally that occurred on January 6, 2021. The tipster provided two screenshots of Kristi Munn’s Facebook account and six screenshots of Kristi Munn’s Snapchat account, which the tipster had seen posted to Kristi Munn’s accounts. The display name on the Facebook account is “Kristi Marie Munn” and the display name on the Snapchat account is “Kristi Munn.” The tipster is a relative of Kristi Munn’s fiancé. The tipster has personally met Kristi Munn and spent time with her during the 2020 Christmas holiday season, which was less than a month before January 6, 2021. The tipster also provided Kristi Munn’s telephone number and claimed that she lived with her fiancé, both of which I verified to be true.

One of the Facebook screenshots provided by the tipster was a post of a photograph of Kristi Munn and five additional individuals who were “tagged” in the post as Facebook users Tom Munn, Dawn Munn, Kayli Munn, Minor Child 1 (MC1), and Josh Munn.¹ According to Facebook, when you tag someone, you create a link to their profile. Kristi Munn added text to the photograph: “Washington D.C. here we come... #StopTheSteal #TrumpIsMyPresident.” The screenshot is shown below in Figure 1.

¹ Your affiant notes that the Facebook account identified by the tipster appears to include Kristi Munn’s middle name—Marie—however, the tipster did not include Kristi Munn’s middle name in identifying her or her Facebook account.

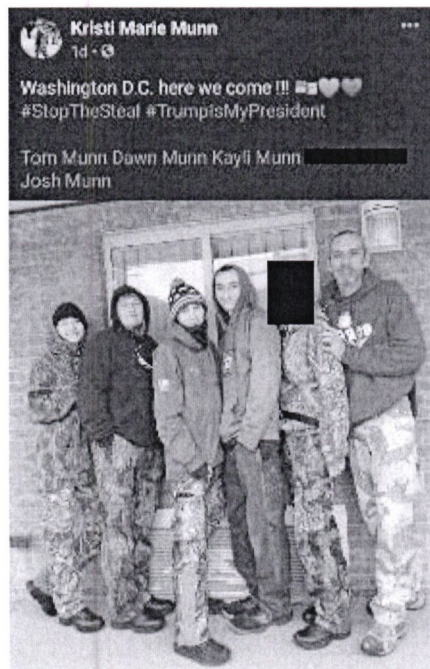


Figure 1 – Screenshot depicting from left to right, Kayli Munn, Dawn Munn, Kristi Munn, Josh Munn, MC1, and Tom Munn

The other Facebook screenshot provided by the tipster was a post of a photograph of Kristi Munn, which appears to be taken outside with other protestors in the background. Kristi Munn added text to the photograph: "January 6th 2021... God Bless The USA." The screenshot is shown below in Figure 2.



Figure 2 – Screenshot depicting Kristi Munn

The tipster provided six Snapchat screenshots from Kristi Munn's Snapchat account that were posted on January 6, 2021, to her Snapchat Story. Information at the top of the screenshots indicates that the photographs were posted to the account bearing the name "Kristi Munn." Based on my training and experience, it appears the screenshots were taken near the U.S. Capitol. The Snapchat screenshots are included below in Figures 3, 4, 5, 6, 7, and 8.



Figure 3



Figure 4

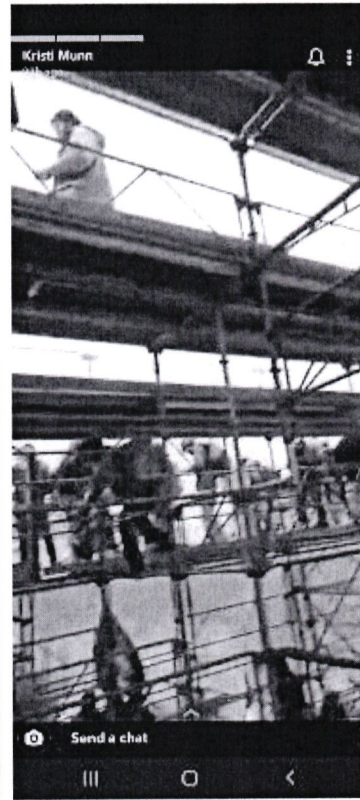


Figure 5



Figure 6



Figure 7

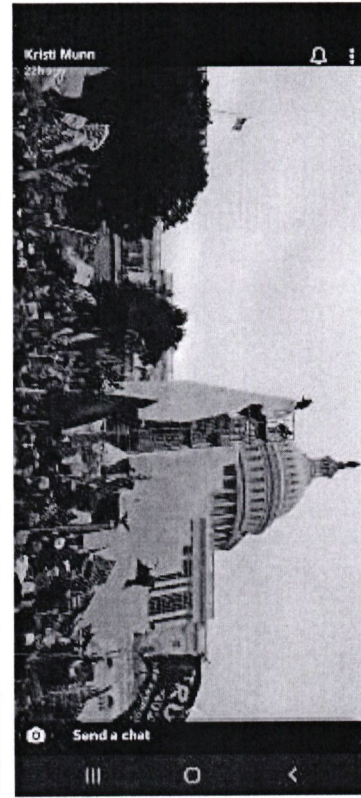


Figure 8

Publicly Available Facebook Information

I subsequently attempted to identify and review Kristi Munn's Facebook account, but I could not locate an account in that name. During another follow-up interview with the tipster, the tipster confirmed that Kristi Munn's Facebook page (under the name Kristi Marie Munn) was no longer accessible. Facebook accounts belonging to Tom Munn, Dawn Munn, Josh Munn, Kayli Munn, and MC1, were located and reviewed. A Facebook account belonging to Kelsi Munn, a member of the Munn family who does not currently appear to have traveled to Washington, D.C., was also identified and reviewed. The accounts revealed additional information indicating that Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, Kayli Munn, and MC1 traveled to the U.S. Capitol on or before January 6, 2021. Examples of these posts are provided below.

For example, in a post from December 28, 2020, Tom Munn posted an image on Facebook that included the text: "POTUS HAS REQUESTED YOUR ATTENDANCE WASHINGTON DC JANUARY 6TH 2021." He added the text, "Our President has only asked two things from us, so far... #1 Vote #2 January 6, 2021." A screenshot of the post is shown below in Figure 9.

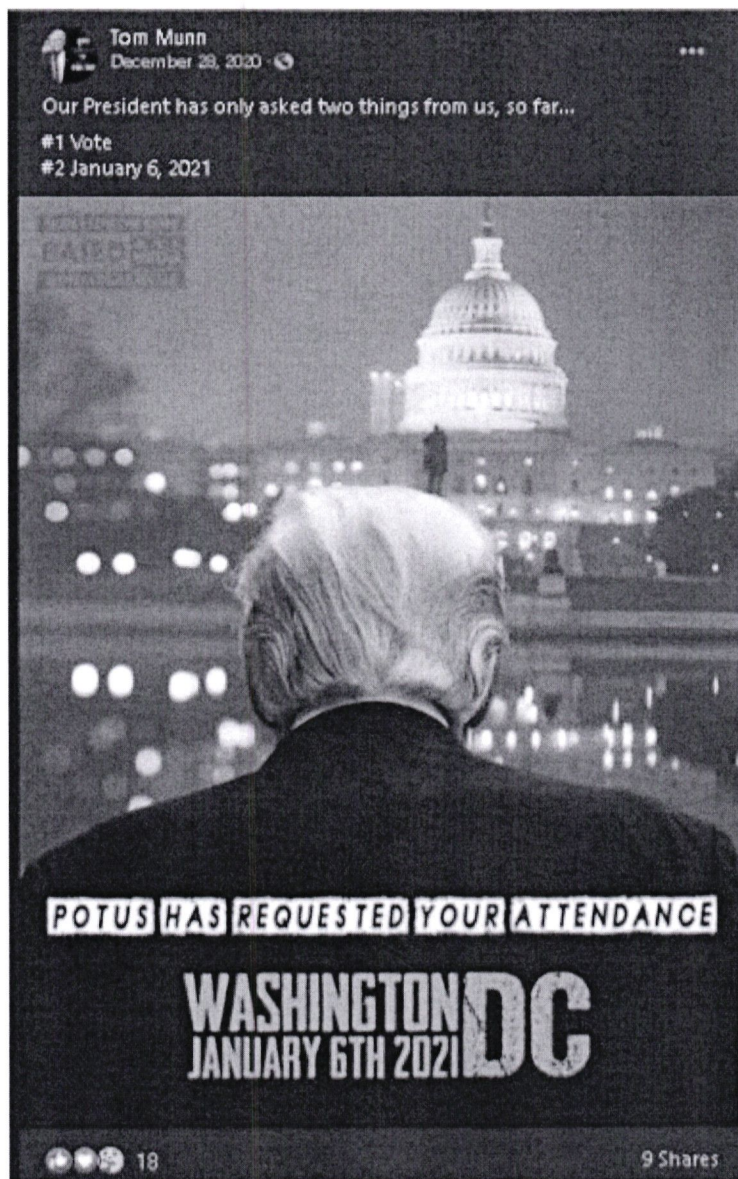


Figure 9 – Screenshot from Tom Munn’s Facebook

In a post from January 2, 2021, Tom Munn posted an image on Facebook that included the text, “MARCH ON CONGRESS JAN 6TH 7 AM at US Capitol.” He added the text, “The time has come!” A screenshot of the post is shown below in Figure 10.



Figure 10 – Screenshot from Tom Munn’s Facebook

In a post from January 5, 2021, Tom Munn wrote, in part: “We made it to our hotel just outside DC ... 1,600 miles in 24 hrs!” A screenshot of the post is shown below in Figure 11.



Figure 11 – Screenshot from Tom Munn’s Facebook

In a post from January 6, 2021, Tom Munn posted a photograph of himself with five additional individuals on Facebook. It appears the photograph was taken outside the U.S. Capitol near a crowd of protestors. Four of the five other individuals in the photograph were tagged as Facebook users MC1, Josh Munn, Kayli Munn, and Dawn Munn. Excerpts from Tom Munn’s post include: “Made it back to the hotel about an hour ago . . . Have lots of pics and video to follow . . . the DC police opened up on a small group climbing the scaffolding, with gas grenades . . . The only damage to the capital building was several windows and sets of doors. Nothing inside the capital was damaged. I can tell you, patriots NEVER made it to the chamber. There was no violence in the capital building, the crowd was NOT out of control . . . they were ANGRY!!!” A screenshot of the post is shown below in Figure 12.



Figure 12 – Screenshot from Tom Munn’s Facebook

In a post from January 6, 2021, Kelsi Munn posted five photographs on Facebook, one of which is the same photograph Tom Munn posted on January 6, 2021 (identified above as Figure 12). Excerpts from Kelsi Munn’s post include: “These women stormed OUR capital and demanded OUR House and Country back!!!! They did not brake [sic] burn threaten swear push touch or hurt another American there today but they damn sure made their voice hear [sic]!!!” A screenshot of the post is shown below in Figure 13.



Kelsi Munn

January 6 · 🌐

The biggest and best female empowerment I have ever seen before in my life!!! These are the women in history 50 years from not I wanna read about!!! Not just words on a screen....these women stormed OUR capital and demanded OUR House and Country back!!!! They did not brake burn threaten swear push touch or hurt another American there today but they damn sure made their voice hear!!! So a lesson to ever woman young and old if you really wanna be free to speak your mind you wanna be free to do whatever you set your mind THIS IS HOW YOU DO IT!!!! This is exactly what women back in 1848 started marching for!!!! This is what they would be proud to see women doing with all the rights and freedoms 170 years later!!! If more women like these 4 right here start to stand up for what really matters and what is right not easy I have 100% faith that we will take back our country and we will take back what it is to be called Not just a woman or an American but a full blown 100% free and proud a** AMERICAN WOMAN!!!! Now get your a** home to the girls and the kids home fire is burning Kiohi Munn and Kourtnei Munn 🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸



Figure 13 – Screenshot from Kelsi Munn's Facebook

Law Enforcement Database Checks

I requested that the Texas Department of Public Safety (DPS) conduct database checks for the names Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn. DPS returned driver's license information and photographs for all of them. Kristi Munn's driver's license was associated with the addresses 1** Avalon Street and 1** B Castle Drive, both in Borger, Texas. Tom, Dawn, and Kayli Munn's driver's licenses were associated with 1*8 Avalon Street in Borger, Texas. Josh Munn's driver's license was also associated with 1** B Castle Drive in Borger, Texas.

Interview of Kristi Munn

On January 25, 2021, I attempted to interview Kristi Munn at her residence in Borger, Texas, but she was not home. On January 26, 2021, I spoke with her by telephone. She admitted to going to the U.S. Capitol to see President Trump speak and to express her First Amendment rights to object to the electoral college results, but denied going inside the Capitol or participating in any violence, vandalism, or any other criminal activity at the Capitol.

Identification of Kristi, Tom, Dawn, Josh and Kayli Munn Inside the U.S. Capitol Building

I have located multiple videos in which I identified some or all of the following members of the Munn family inside the U.S. Capitol on January 6, 2021: Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, Kayli Munn, and MC1. These identifications were based on my familiarity with the physical appearances of each of the Munns and my knowledge of the clothing they wore on January 6, 2021, in Washington, D.C. This was obtained by reviewing their driver's license photographs and the photographs posted on Facebook discussed above. Based on the Facebook photographs, I noted the following clothing descriptions: Kristi Munn was wearing a green hooded sweatshirt, camouflage pants, a red, white, and blue winter hat, and a blue Trump 2020 Keep America Great flag draped across her back. Tom Munn was wearing a red Borger Bulldogs hooded sweatshirt and camouflage pants. Dawn Munn was wearing a black hooded sweatshirt, camouflage pants, a camouflage balaclava, and sunglasses. Josh Munn was wearing a black coat, a grey Green Bay Packers hooded sweatshirt, jeans, and a camouflage balaclava. Finally, Kayli Munn was wearing a camouflage jacket, camouflage pants, and a winter hat with a "45" patch.

One example of a video I located is security footage from the Senate Wing Door on January 6, 2021. In the video, I identified Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn entering the U.S. Capitol by crawling through a window at approximately 2:25 p.m. I took screenshots from the video and included them below. Figure 14 depicts Kristi Munn, while Figure 15 depicts Tom Munn. Figure 16 depicts Dawn Munn. Figure 17 depicts Josh Munn, and Figure 18 depicts Kayli Munn.



Figure 14 – Screenshot identifying Kristi Munn (marked in red)



Figure 15 – Screenshot identifying Tom Munn (marked in red)



Figure 16 – Screenshot identifying Dawn Munn (marked in red)



Figure 17 – Screenshot identifying Josh Munn (marked in red)



Figure 18 – Screenshot identifying Kayli Munn (marked in red)

Another video contains security footage from the area located in-between the Crypt of the Capitol and the Capitol Visitor Center on January 6, 2021. In the video, I identified Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn inside the U.S. Capitol moving from the Crypt toward the Visitor Center between approximately 2:30 p.m. and 2:36 p.m. I took screenshots from the video and included them below. Figure 19 depicts Kristi, Tom, Dawn, Josh, Kayli, and MC1 Munn. Figure 20 depicts Kristi Munn, while Figure 21 depicts Tom Munn. Figure 22 depicts Dawn Munn, and Figure 23 depicts Josh Munn. Figure 24 depicts Kayli Munn.



Figure 19 – Screenshot identifying all the Munns (marked in red)



Figure 20 – Screenshot identifying Kristi Munn (marked in red)

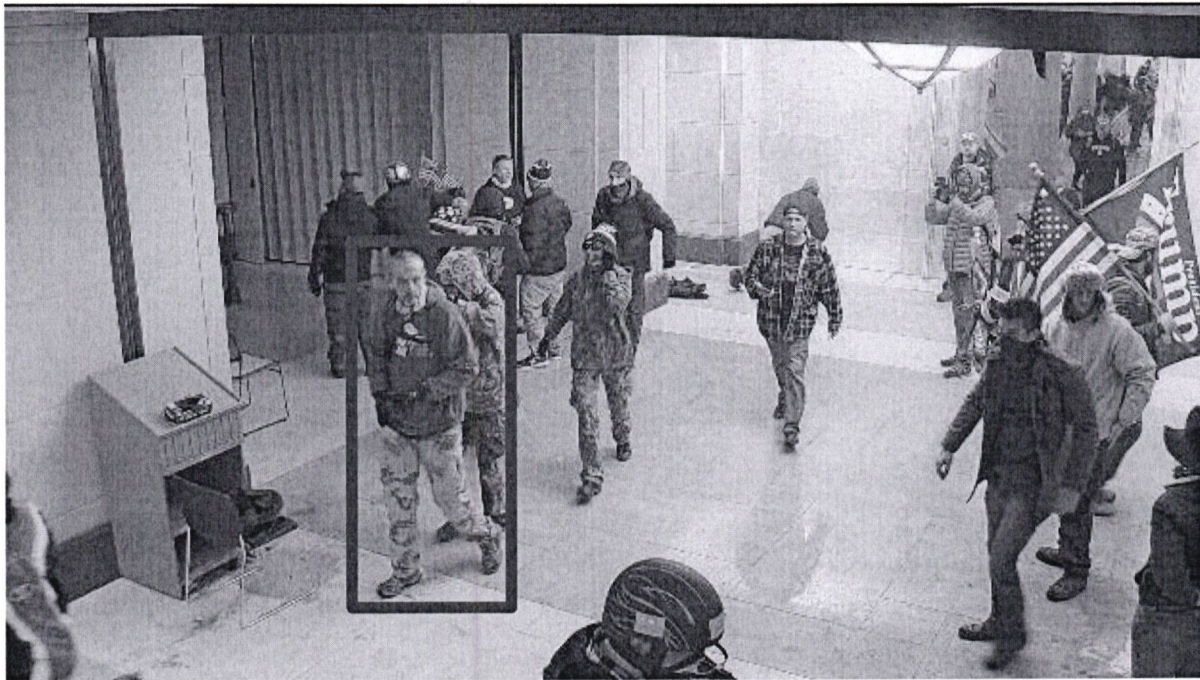


Figure 21 – Screenshot identifying Tom Munn (marked in red)



Figure 22 – Screenshot identifying Dawn Munn (marked in red)



Figure 23 – Screenshot identifying Josh Munn (marked in red)



Figure 24 – Screenshot identifying Kayli Munn (marked in red)

Another video contains security footage from the interior area of the Memorial Door of the Capitol on January 6, 2021. In the video, I identified Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn moving inside the U.S. Capitol between approximately 2:45 p.m. and 2:46

p.m. I took screenshots from the video and included them below. Figure 25 depicts Kristi Munn, while Figure 26 depicts Tom Munn. Figure 27 depicts Dawn Munn. Figure 28 depicts Josh Munn, and Figure 29 depicts Kayli Munn.

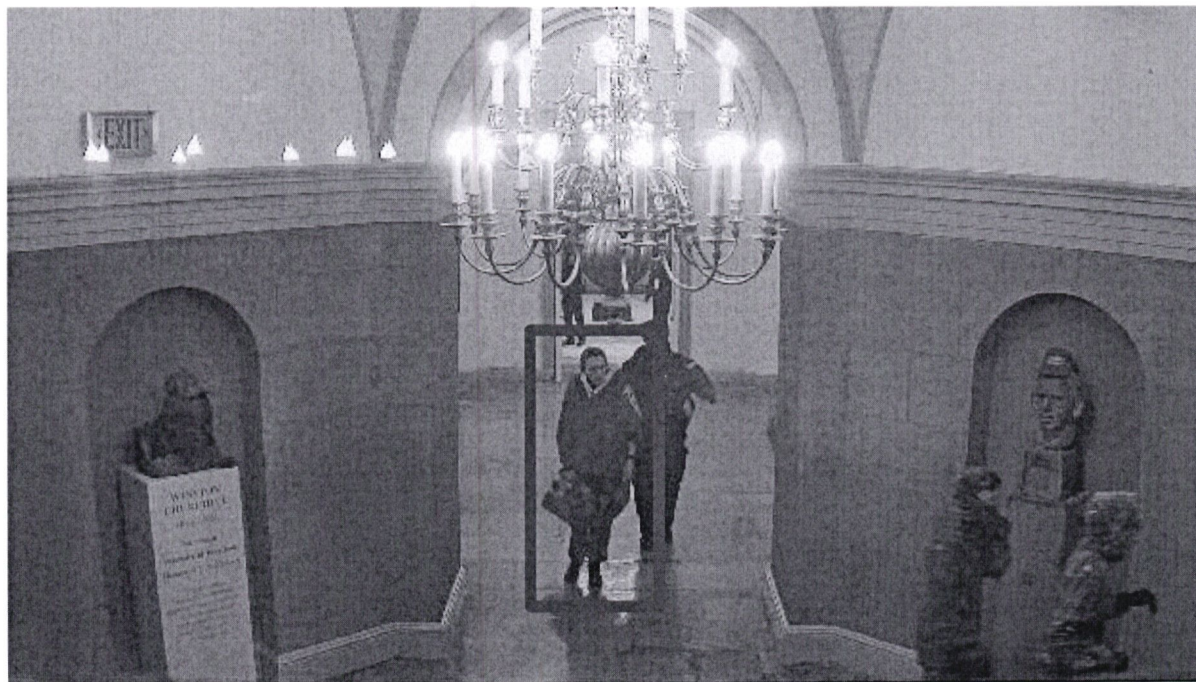


Figure 25 – Screenshot identifying Kristi Munn (marked in red)



Figure 26 – Screenshot identifying Tom Munn (marked in red)



Figure 27 – Screenshot identifying Dawn Munn (marked in red)



Figure 28 – Screenshot identifying Josh Munn (marked in red)



Figure 29 – Screenshot identifying Kayli Munn (marked in red)

Another video contains footage from the Senate Wing Door on January 6, 2021. In the video, I identified Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn exiting the

U.S. Capitol by crawling through a window at approximately 3:17 p.m. I took a screenshot from the video and included it below. Figure 30 depicts Kristi, Tom, Dawn, Josh, Kayli, and MC1 Munn.



Figure 30 – Screenshot identifying all the Munns (marked in red)

I also found video of Kristi, Tom, Dawn, Josh, and Kayli Munn inside the U.S. Capitol on January 6, 2021, posted to the social media platform Parler. This video was submitted by an anonymous tipster to the FBI. In the video, I identified Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn inside the Crypt. I took screenshots from the video and included them below. Figure 31 depicts Kristi Munn. Figure 32 depicts Tom Munn, while Figure 33 depicts Dawn Munn. Figure 34 depicts Josh Munn, and Figure 35 depicts Kayli Munn.



Figure 31 – Screenshot identifying Kristi Munn (marked in red)



Figure 32 – Screenshot identifying Tom Munn (marked in red)

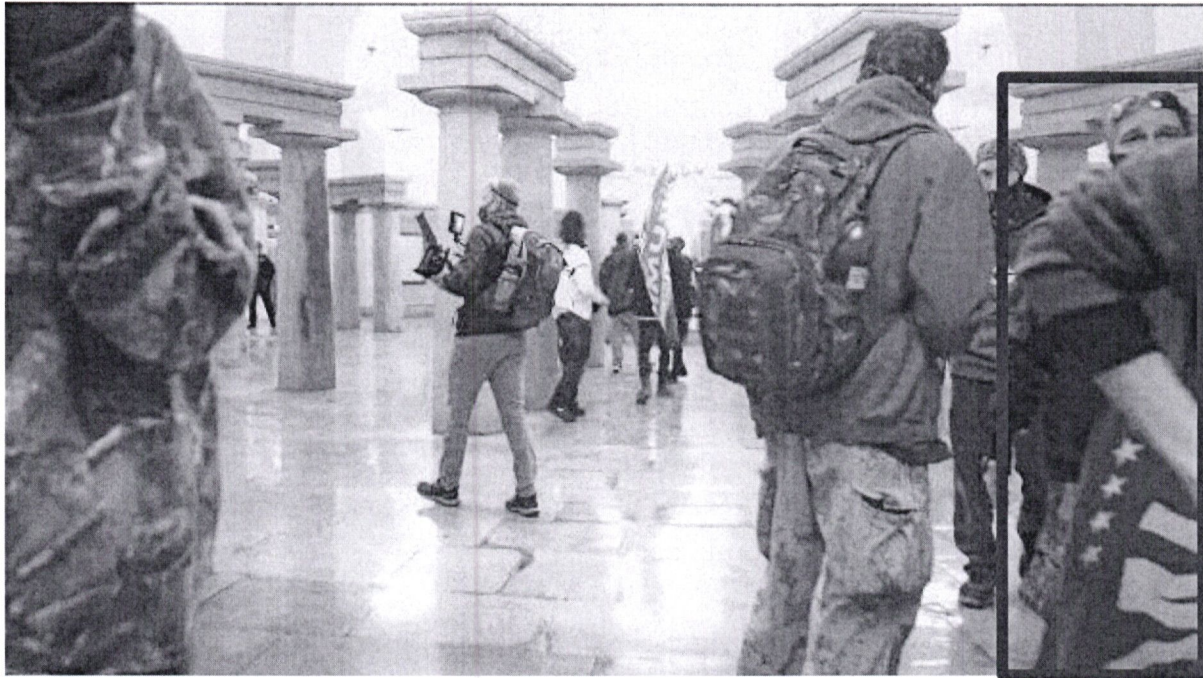


Figure 33 – Screenshot identifying Dawn Munn (marked in red)

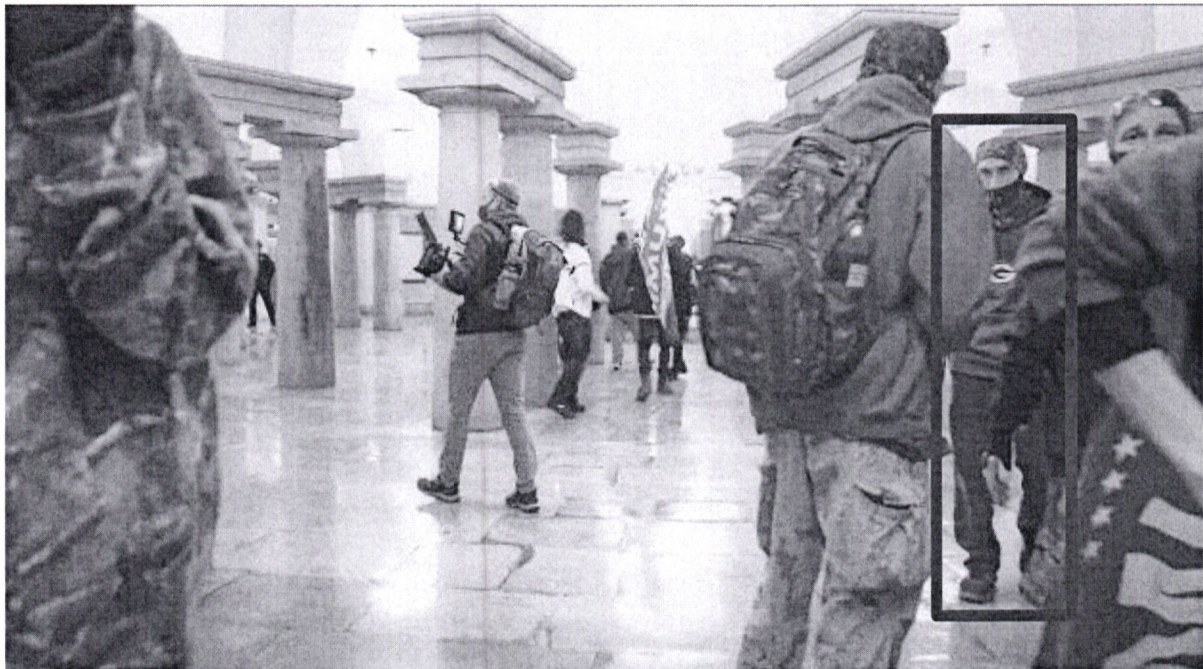


Figure 34 – Screenshot identifying Josh Munn (marked in red)



Figure 35 – Screenshot identifying Kayli Munn (marked in red)

Your affiant also found video of Kristi, Tom, Dawn, Josh and Kayli Munn inside the U.S. Capitol on January 6, 2021, on a livestream video filmed by social media personality and filmmaker Anthime “Tim” Gionet, aka “Baked Alaska,” and posted to DLive, a live video streaming platform. In the video, I identified Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn inside the U.S. Capitol on January 6, 2021. I identified them in room S-145, which is located on the first floor of the Senate Wing near the Senate Wing door. I took screenshots from the video and included them below. Figure 36 depicts Kristi Munn. Figure 37 depicts Tom Munn, while Figure 38 depicts Dawn Munn. Figure 39 depicts Josh Munn, and Figure 40 depicts Kayli Munn.



Figure 36 – Screenshot identifying Kristi Munn (marked in red)

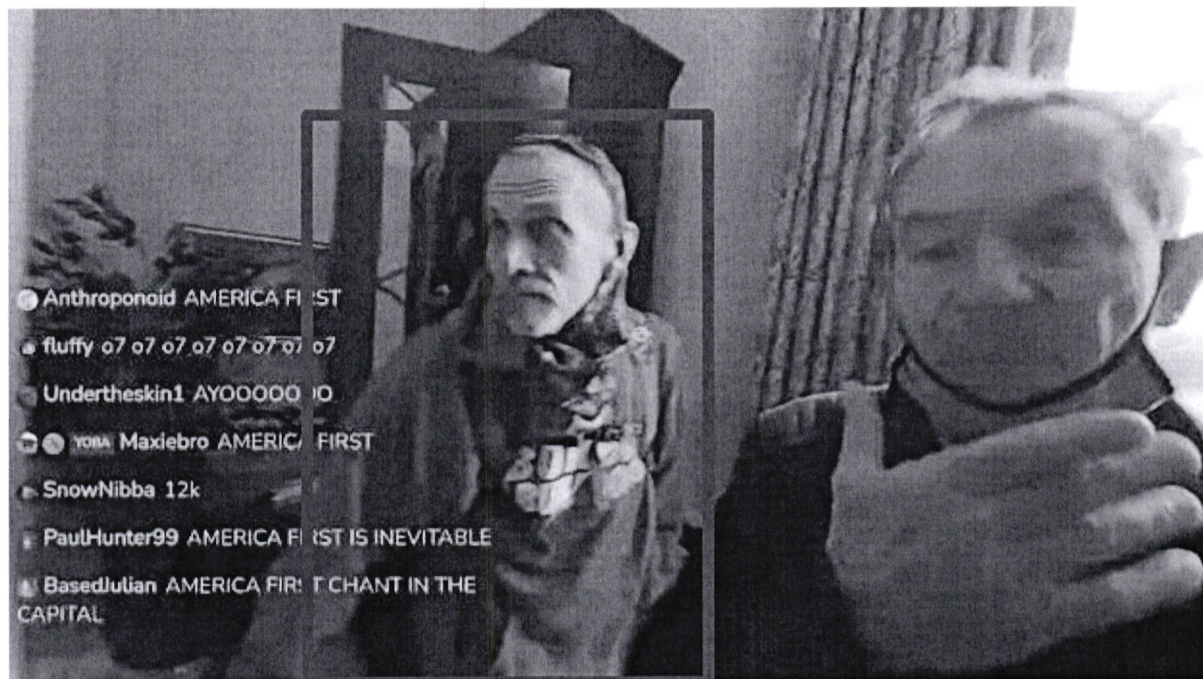


Figure 37 – Screenshot identifying Tom Munn (marked in red)



Figure 38 – Screenshot identifying Dawn Munn (marked in red)

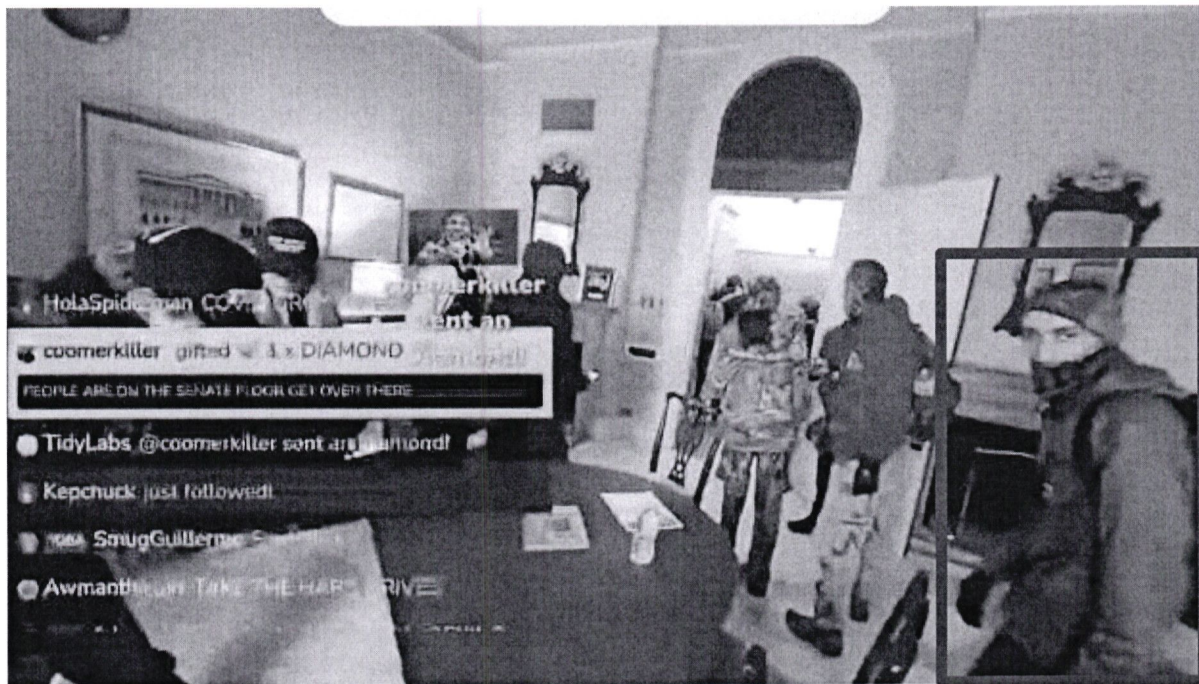


Figure 39 – Screenshot identifying Josh Munn (marked in red)



Figure 40 – Screenshot identifying Kayli Munn (marked in red)

Third Party Identification of the Munns Inside the U.S. Capitol

I interviewed three individuals who are familiar with one or more members of the Munn family and their appearances. During the interviews, I showed each interviewee screenshots from videos some of which are discussed in this Statement, that depicted Kristi, Tom, Dawn, Josh, and Kayli Munn inside the U.S. Capitol building.

The first interviewee (I1) was an employee at a high school in Borger, TX who had taught multiple Munn children, including Kayli Munn. I1 was also familiar with Tom Munn and Dawn Munn and had seen them in-person. I1 identified Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn in screenshots taken from inside the U.S. Capitol building.

The second interviewee (I2) also was an employee at a high school in Borger, TX who had taught multiple Munn children, including Kayli Munn. I2 was familiar with Tom Munn and Dawn Munn and had met and spoken to them in-person. I2 identified Tom Munn, Dawn Munn, and Kayli Munn in screenshots taken from inside the U.S. Capitol building.

The third interviewee (I3) was an employee at a college in Borger, TX who had taught Dawn Munn and Kristi Munn. I3 also had seen Tom Munn and Josh Munn in-person and was familiar with what they looked like. I3 was able to identify Tom Munn, Dawn Munn, Kristi Munn, and Josh Munn in screenshots taken from inside the U.S. Capitol building.

Facebook Information Pertaining to the Munns Inside the U.S. Capitol Building

Pursuant to federal search warrants, I reviewed seven Facebook accounts belonging to Kristi Munn,² Tom Munn, Dawn Munn, Josh Munn, Kayli Munn, and Kelsi Munn. The returned information revealed comments, private messages, and media indicating Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn entered and remained inside the U.S. Capitol on January 6, 2021.

Information from Kristi Munn's Facebook Account

According to Facebook, "Kristi Marie Munn" is the name provided by the account holder of Facebook account ending in 3445.

In a Facebook conversation with Jarod [last name withheld] on January 7, 2021, Kristi Munn wrote, "We were in the capital !!" ... "Just keep that bit of info on the DL for right now." In a conversation with Mindy [last name withheld] on January 7, 2021, Mindy wrote, "How did anyone even get past the front doors... 'With how secure it is' makes me wonder if they was let in... My own thoughts." Kristi Munn replied, "There was no security" ... "No national guard !!" ... "I can promise you no one destroyed anything walking through the capital."

On January 7, 2021, Kristi Munn posted the following status and follow-up comments on Facebook: "I was just thinking... tear gas tastes like freedom #StopTheSteal #TrumpIsMyPresident." A Facebook user commented, "Do you know this from experience??" Kristi Munn replied, "I do now." Another Facebook user commented, "Did y'all get gassed?" Kristi Munn replied, "They gassed us all. We never fought back ! We pushed forward and asked them to join us !! So proud of my Patriots."

On January 6, 2021, an unidentified user of Minor Child 2's (MC2) Facebook account sent Kayli Munn a video via Facebook messenger that was filmed from inside the Capitol. The video was shot through an external window of the Capitol and depicted protestors and law enforcement officers outside the Capitol. The video was approximately five seconds in length. A screenshot taken from the Facebook video is shown below in Figure 41.

² Two separate Facebook accounts belonging to Kristi Munn were reviewed.

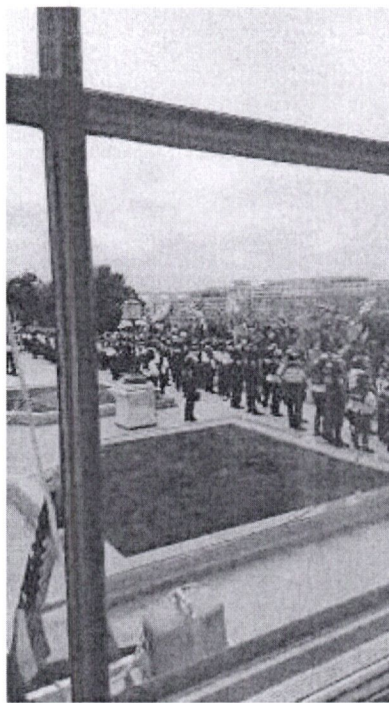


Figure 41 – Screenshot from Facebook video

I believe the individual filming the video to be Kristi Munn. The video appears to be filmed near the same window that Kristi was standing and using her phone at in the DLive livestream video previously mentioned. A screenshot of Kristi Munn from the DLive video is shown below in Figure 42.



Figure 42 – Screenshot of Kristi Munn from DLive video

MC2 is Kristi Munn's minor child. MC2 does not currently appear to have traveled to Washington, D.C. on January 6, 2021. According to a Facebook message, Kristi Munn indicated that she was utilizing MC2's Facebook account. In a Facebook conversation with Mindy [last name withheld] on January 7, 2021, Kristi Munn wrote, "I sent it to you from my [child]'s Facebook. [His/her] name as [sic] [first name withheld] lol. I took so many videos I had to start using [his/her] phone because mine ran out of space."

Information from Tom Munn's Facebook Account

According to Facebook, "Tom Munn" is the name provided by the account holder of Facebook username tom.munn.96.

On January 6, 2021, Tom Munn posted the following status on Facebook: "WOW!!! Made it back to the hotel about an hour ago...couldn't post in DC, no cell service? Have lots of pics and videos to follow as soon as we can get them downloaded...I need to tell you all that the media is LYING TO YOU...the DC police opened up on a small group climbing the scaffolding, with gas grenades...the concussions rippled through the crowd...which only ignited the crowd and patriots began chanting "they are stealing our country" and "press forward" as they were carrying the wounded out through us. The only damage to the capital building was several windows and sets of doors. Nothing inside the capital was damaged. As for the shooting, I did not see it but I can tell you, patriots NEVER made it to the chamber. There was no violence in the capital building, the

crowd was NOT out of control...they were ANGRY!!! The media wasn't even there, never saw any media or police...the vast majority of the crowd was heading back down Constitution and Pennsylvania avenues by 5pm, with virtually no police presence, as Antifa began marching through the middle of us towards the capital. They are now calling this and [sic] insurrection...?"

On January 7, 2021, Tom Munn posted the following status on Facebook: "Things were happening so fast...couldn't take pics as we were moving...saw a Vietnam Vet laying on the ground, he couldn't see, as he had been hit in the face with the tear gas... people were trying to help him and wash out his eyes...he kept pushing them away screaming, "I'm fine!...keep pushing forward!!! I will never forget it!"

Information from Dawn Munn's Facebook Account

According to Facebook, "Dawn Munn" is the name provided by the account holder of Facebook username dawn.munn.92.

In a Facebook conversation with Clara [last name withheld] on January 6, 2021, Dawn Munn wrote, "We went in and stormed capital!" In a conversation with Carman [last name withheld] on January 6, 2021, Dawn Munn wrote, "We were in capital!! ... I do mean IN the building!!" In a conversation with Kelsi Munn on January 6, 2021, Dawn Munn wrote, "We stormed in....went in and out broken window!!" Kelsi Munn replied, "Who broke a window???? ... That's way cool tho." Dawn Munn replied, "They barricaded the door so they took out window...climbed in!!!"

Information from Josh Munn's Facebook Account

According to Facebook, "Josh Munn" is the name provided by the account holder of Facebook username josh.munn.54.

In a Facebook conversation with Joel [last name withheld] on January 6, 2021, Josh Munn wrote, "Before you hear it on the news I am I [sic] family marched on DC today it was extremely cool we did enter the Capitol building with the" ... "Second group there was no violence from the protesters at all it all came from the police believe it or not" ... "It was super cool everything was cool till the cop used tear gas that is when people got mad but still never hurt anyone." Joel replied, "Damn how did y'all get in the capital building." Josh Munn replied, "The first group opened up a window sort of say and we followed it through." Joel responded, "Oh so u broke in?" Josh Munn replied, "No we did not brake [sic] In the window was opne [sic] when i got there" ... "There was one thing that I will say we may have broken a couple Windows to get in but when we were there no one was allowed to damage break or steal anything in the Capitol building." In a conversation with Kelsi Munn on January 7, 2021, Josh Munn wrote, "So ya they don't know shit and the cop

look calm and happy outside of the capital but the one on the inside were trying to get us mad they would try using teargas shoot a couple of people with rubber bullets we weren't over by that though" ... "I am still feeling the teargas so ya I'm pissed" ... "It was all over the Capitol building they used it in the hallway to try and keep us out."

Information from Kayli Munn's Facebook Account

According to Facebook, "Kayli Munn" is the name provided by the account holder of Facebook username kayli.munn.

In a Facebook conversation with Kerri Munn on January 6, 2021, Kayli Munn received the message, "How's the March." Kayli Munn replied, "Fucking great! Holy shit we were inside the fucking capital!"

Location Information for the Munns

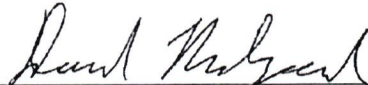
According to records obtained through a search warrant which was served on AT&T, on January 6, 2021, in and around the time of the incident, the cellular telephone associated with 806-XXX-8254 was identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol building. This telephone number is utilized by Kristi Munn. I know this based on a telephone conversation I had with Kristi Munn at this number on January 26, 2021. This number is also a verified telephone number for one of her Facebook accounts.

According to records obtained through a search warrant which was served on Verizon, on January 6, 2021, in and around the time of the incident, the cellular telephone associated with 806-XXX-1660 was identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol building. This telephone number is utilized by Josh Munn. In a Facebook message from February 2021, he wrote that his phone number was 806-XXX-1660. This number is also a verified phone number for his Facebook account.


According to records obtained through a search warrant which was served on Verizon, on January 6, 2021, in and around the time of the incident, the cellular telephone associated with 806-XXX-0871 was identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol building. This telephone number is utilized by Kayli Munn. In a Facebook message from February 2021, she wrote that her phone number was 806-XXX-0871. This number is also provided on her Texas driver's license and is a verified phone number for her Facebook account.

Based on the foregoing, your affiant submits that there is probable cause to believe that Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn violated 18 U.S.C. §§ 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that Kristi Munn, Tom Munn, Dawn Munn, Josh Munn, and Kayli Munn violated 40 U.S.C. §§ 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.


David Lee Bolyard, Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 12th day of July, 2021.

 2021.07.12
10:12:35 -04'00'
ZIA M. FARUQUI
UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KRISTI MUNN (AKA: KRISTI MARIE
MUNN), THOMAS MUNN (AKA: TOM
MUNN), DAWN MUNN, JOSHUA
MUNN (AKA: JOSH MUNN), AND
KAYLI MUNN,

Defendants.

Case: 1:21-mj-00521
Assigned to: Judge Meriweather, Robin M.
Assign Date: 7/12/2021
Description: COMPLAINT W/ ARREST WARRANT

VIOLATIONS:

18 U.S.C. § 1752(a)(1)
(Knowingly Entering or Remaining in any
Restricted Building or Grounds Without
Lawful Authority)

18 U.S.C. § 1752(a)(2)
(Disorderly and Disruptive Conduct in a
Restricted Building or Grounds)

40 U.S.C. § 5104(e)(2)(D)
(Disorderly Conduct in a Capitol Building)

40 U.S.C. § 5104(e)(2)(G)
(Parading, Demonstrating, or Picketing in
a Capitol Building)

ORDER

This matter having come before the Court pursuant to the application of the United States to seal criminal complaint, the Court finds that, because of such reasonable grounds to believe the disclosure will result in flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation, the United States has established that a compelling governmental interest exists to justify the requested sealing.

1. IT IS THEREFORE ORDERED that the application is hereby GRANTED, and that the affidavit in support of criminal complaint and other related materials, the instant application to seal, and this Order are sealed until the arrest warrants are executed.

2. IT IS FURTHER ORDERED that the Clerk's office shall delay any entry on the public docket of the arrest warrants until they are executed.

Date: July 12, 2021



2021.07.12

10:14:33 -04'00'

ZIA M. FARUQUI
UNITED STATES MAGISTRATE JUDGE